

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

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<b>In Re:</b>	)	
	)	
<b>JOHN MALONE</b>	)	
	)	
	)	<b>Chapter 13</b>
	)	<b>Case No. 24-10885-CJP</b>
<b>Debtor</b>	)	
	)	

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**EXPIDETED MOTION TO CONTINUE STATUS CONFERENCE  
SCHEDULED FOR MARCH 25, 2025**

Now comes, Glenn F. Russell, Jr., counsel for John Malone (“Debtor”) who herein respectfully submits the instant Expedited Motion to Continue the 2:00PM March 25, 2025 status conference.

As reasons therefore, undersigned has had great difficulty in reaching the Debtor subsequent to the last hearing in this matter, and only finally reached the Debtor by phone last Friday, March 21, 2025. During the phone discussion, undersigned relayed/informed the Debtor of the Court’s concerns/statements as made at the last hearing in this matter, and that undersigned would be withdrawing as counsel.

Subsequent to this phone call, on Friday, March 21, 2025 undersigned contacted the Chapter 13 Trustee to discuss the fact that undersigned had only finally reached the Debtor and had relayed the Court’s comments/concerns to the Debtor.

Undersigned has identified counsel who has specialized knowledge involving the particular fact pattern presented in this matter, and who has agreed to step into the shoes of

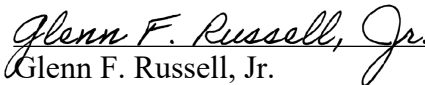
undersigned and complete the duties necessary to bring the instant case to a conclusion.

However, the parties need a little more time to provide replacement counsel time to enter into a new client agreement with the Debtor, and relatedly to allow undersigned to file a Notice of Withdrawal of representation.

Undersigned has contacted the Chapter 13 Trustee about possibly continuing the March 25, 2025 status conference for the above reasons, and she has assented to this request.

WHEREFORE, for all of the above reasons, the Debtor requests a two-week continuance of the status conference scheduled for March 25, 2025 , or for such time the Court is available

Respectfully submitted,

  
Glenn F. Russell, Jr.

Date: March 24, 2025  
Attorney for the Debtor

Glenn F. Russell, Jr.  
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Fall River, MA 02720  
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russ45eq@gmail.com

CERTIFICATE OF SERVICE

I, Glenn F. Russell, Jr., do hereby certify that on the 24<sup>th</sup> day of March 2025, I served the above document, to the following parties via electronic mail and submission to the ECF System, and/or by USPS postage prepaid to the following:.

***Assistant U.S. Trustee***

**John Fitzgerald**

Office of the US Trustee

J.W. McCormack Post Office &

Courthouse

5 Post Office Sq., 10th Fl, Suite 1000

Boston, MA 02109

***Trustee***

Carolyn Bankowski

Ch 13-12 Trustee Boston

P. O. Box 8250

Boston, MA 02114

617-723-1313

28 Berkshire, LLC

Peter D. Pasciucco

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Worcester, MA 01608

Januzak Almazbek

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82 Union Street

Quincy, MA 02169

/s/ Glenn F. Russell, Jr.

Glenn F. Russell, Jr.